Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Carrier Reports on Implementation	)	CC Docket 94-102
Of Wireless E911 Phase II	)	
Automatic Location Identification	)	

TELECORP PCS, INC.
SUPPLEMENTAL E911 PHASE II REPORT

On November 9, 2000, TeleCorp PCS, Inc., along with its affiliates, ("TeleCorp") filed a report on its plans for implementation of wireless E911 Phase II automatic location identification ("ALI") systems.[1/] In that Report, TeleCorp stated that it was not in a position to choose between a handset and network overlay solution, but it committed to filing an amended report as soon as possible regarding its choice of Phase II ALI technology and its continuing efforts to find a compliant solution. On December 15, 2000, the Commission requested that TeleCorp provide a supplemental report on its E911 Phase II ALI implementation plan that provided the following required information:

- Type of ALI technology to be deployed;
- Testing and verification plan for technology;
- Implementation details and schedule;
- Existing handset information; and
- Location of non-compatible handset information.

Pursuant to this request, TeleCorp provides the following information.

[1/] See TELECORP Wireless Services, Inc. E911 Phase II Report, CC Docket No. 94-102 (filed Nov. 9, 2000).

INTRODUCTION

On November 30, 2000, AT&T announced that it is forming a strategic alliance with NTT DoCoMo, Japan's leading mobile communications company, to develop the next generation of mobile multimedia services on a global-standard, high-speed wireless network.[2/] To speed the introduction of these new data services, AT&T has informed the Commission it will overlay a GSM (Global System for Mobile Communications)/GPRS (General Packet Radio Service) platform to its existing nationwide TDMA network.

TeleCorp is an affiliate of AT&T and its network, under the SunCom brand, must be compatible with AT&T's system. As such, TeleCorp will also be undergoing a transition from the TDMA to GSM air interface. As AT&T has informed the Commission previously, this change will give TeleCorp's network higher speed data capabilities and its customers a wider array of mobile devices from the world's GSM vendors. Nevertheless, as the Commission doubtless recognizes, the expected transition -- falling at the same time as the Phase II report was due -- seriously complicated TeleCorp's plans regarding the most appropriate ALI technology. Until the decision about the DoCoMo transaction and the air interface change was final and announced to the public, TeleCorp was not in a position to choose between the various Phase II technologies.

As described in its November 9 Report, TeleCorp is fully committed to enhancing the safety of its subscribers and the communities it serves and, therefore, it continues to investigate every possible location service technology. Moreover, TeleCorp has every intention of complying with the FCC's Phase II implementation deadlines. After more than a year of testing and analysis, TeleCorp finds itself in agreement with most other carriers and public safety

---

[2/] See Press Release, TELECORP and NTT DoCoMo Announce Strategic Wireless Alliance (November 30, 2000).

agencies that, ultimately, the best Phase II technology is handset-based. Handset technology has demonstrated the potential to be far more accurate than network-overlay solutions and it is considerably more adaptable to changing conditions. Unfortunately, however, the aggressive nature of the Commission's schedule for handset deployment has made it necessary for carriers to consider other, less optimal, interim solutions. As described below, TeleCorp has developed a Phase II implementation plan that it believes comes as close to meeting the Commission's requirements as any other proposed solution.

I. GSM Network

As noted above, TeleCorp's decision to change its air interface to GSM was based on its determination that such action would expedite the provision of the next generation of advanced wireless services to customers, in accordance with the Commission's oft-stated goals.[3/] For purposes of E911 Phase II compliance, TeleCorp intends to deploy throughout its GSM network Enhanced Observed Time Difference of Arrival ("E-OTD") technology. E-OTD is a hybrid handset and network-based solution, which the Commission recently approved through a waiver to VoiceStream Wireless Corporation. As the Commission noted in that waiver order, E-OTD may be the only viable solution for GSM carriers.[4/]

[3/] See, e.g., News Release, Press Statement of Chairman William E. Kennard on Spectrum Requirements for Advanced Wireless Services (rel. October 13, 2000) ("We look forward to working with the Executive Branch in our respective spectrum management roles to ensure that the American public has widespread and timely access to the next generation of advanced wireless services."); News Release, Industry Settlement Advances Standards Process for Third Generation Wireless Services (rel. March 26, 1999) (Chairman Kennard noted that settlement of a patent dispute "will allow for a speedier deployment of exciting wireless broadband services for the benefit of consumers.").

[4/] Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Fourth Memorandum Opinion and Order, FCC 00-326, at ¶ 56 (rel. Sept. 8, 2000).

TeleCorp contemplates that it will make E-OTD available in its GSM network immediately upon its air interface change out. Specifically, TeleCorp has made requests to its vendors that the GSM infrastructure be E-OTD equipped when installed. TeleCorp intends to apply for any waivers that might be necessary when it has more information on its change-out schedule and the performance and accuracy of the E-OTD technology.

II. TDMA Network

For its pre-existing TDMA network, as noted in its November 9th Report, TeleCorp is investigating the use of a network-based solution. Thus, use of a network-based technology will be TeleCorp's ALI solution for TDMA. If such a technology solution does not achieve necessary compliance with the FCC's mandated requirements, TeleCorp will either seek a waiver of the requirements or notify the Commission of a change in its technology choice within 30 days of the change.

III. TESTING AND VERIFICATION

All testing and verification of location technology to be utilized by TeleCorp for its GSM and TDMA ALI systems will be done in accordance with the principles found in OET Bulletin 71.

IV. EXISTING HANDSETS AND LOCATION OF NON-COMPATIBLE HANDSETS

Because TeleCorp will be utilizing a network-based solution for its TDMA network, existing handsets will be located by its system and there will not be an issue with non-compatible legacy handsets. Additionally, for its new GSM network, all handsets activated on this new network will be compatible with the handset-based location technology. Therefore, the GSM network will not have any preexisting handsets, nor will it have any non-compatible handsets to accommodate.

CONCLUSION

TeleCorp intends to continue its work with vendors to identify the best Phase II solution possible for both its GSM and TDMA networks. At this point, TeleCorp believes that the use of a handset-based solution for its GSM network and a network-based solution for its TDMA network is the approach that will lead to the most effective location network for its subscribers.

Respectfully submitted,

TELECORP PCS, INC. and its Affiliates

_/s/ Thomas Sullivan_____
Thomas Sullivan
Chief Financial Officer

January 2, 2001